

December 29, 2004

Ms. Elizabeth O'Donnell Executive Director Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

kfort, KY 40602

Re: PSC Case No. 2004-00423

Dear Ms. O'Donnell:

Please find enclosed for filing with the Commission in the above-referenced case an original and ten (10) copies of the Motion of East Kentucky Power Cooperative, Inc. for an Enlargement of Time In Which to Respond to Data Requests Dated December 23, 2004.

RECEIVED

DEC 3 0 2004

PUBLIC SERVICE COMMISSION

Very truly yours,

Charles A. Lile

Senior Corporate Counsel

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Enclosures

Cc: Elizabeth E. Blackford, Esq. Michael L. Kurtz, Esq.

### COMMONWEALTH OF KENTUCKY



# BEFORE THE PUBLIC SERVICE COMMISSION DEC 3 0 2004

In the Matter of:	PUBLIC SERVIC COMMISSION
	NOSIM

THE APPLICATION OF EAST KENTUCKY	)
POWER COOPERATIVE, INC. FOR A	)
CERTIFICATE OF PUBLIC CONVENIENCE	)
AND NECESSITY, AND A SITE	) CASE NO. 2004-
COMPATIBILITY CERTIFICATE, FOR THE	) 00423
CONSTRUCTION OF A 278 MW (NOMINAL)	)
CIRCULATING FLUIDIZED BED COAL FIRED	)
UNIT IN MASON COUNTY, KENTUCKY	)

# MOTION OF EAST KENTUCKY POWER COOPERATIVE, INC., FOR AN ENLARGEMEMENT OF TIME IN WHICH TO RESPOND TO DATA REQUESTS DATED DECEMBER 23, 2004

East Kentucky Power Cooperative, Inc., ("EKPC") hereby moves the Kentucky Public Service Commission (the "Commission") for an enlargement of time in which to respond to Data Requests in this case dated December 23, 2004. As grounds for this Motion, EKPC states as follows:

1. EKPC personnel essential to preparing responses to the subject Data Requests have been unavailable due to vacation plans and holiday travel that were scheduled prior to the issuance of the procedural order in this case. Preparation of responses to some of the Data Requests requires access to records and resources which are available only at EKPC offices. While portions of the responses are being prepared by available EKPC personnel, some preparation and review cannot begin until key staff members return to work on January 3, 2005. Due to the volume of work involved, EKPC does not believe that the responses can be submitted by the due date of January 5, 2005.

2. EKPC personnel estimate that responses to the Data Requests can be provided by January 10, 2005. EKPC expresses its appreciation for the Staff's efforts to expedite the proceedings in this case, as EKPC has requested, and will make every effort to file the responses before that date, if possible.

WHEREFORE, EKPC respectfully moves the Commission for an enlargement of time through January 10, 2005, in which to respond to the Data Requests in this case dated December 23, 2004.

Respectfully submitted

DALE W. HENLEY

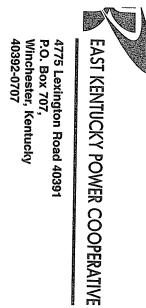
CHARLES A. LILE

ATTORNEYS FOR EAST KENTUCKY POWER COOPERATIVE, INC. P. O. BOX 707 WINCHESTER, KY 40392-0707 (859) 744-4812

## **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Motion of East Kentucky Power Cooperative, Inc. for an Enlargement of Time in Which to Respond to Data Requests Dated December 23, 2004, in the above-referenced case, was transmitted by facsimile, and an original and ten copies were mailed, to Elizabeth O'Donnell, Executive Director, Kentucky Public Service Commission, 211 Sower Boulevard, Frankfort, Kentucky 40601, and copies were mailed to Parties of Record, on December 29, 2004.

CHARLES A. LILE



# First Class Mail

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PUBLIC SERVICE

ELIZABETH O'DONNELL
EXECUTIVE DIRECTOR
KENTUCKY PUBLIC SERVICE COMMISSION
211 SOWER BOULEVARD
FRANKFORT KY 40602